

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Ronald S. Jones, Debtor.) Bankruptcy No. 17-22147-GLT) Chapter 11) Related Document No. 224) Document No.
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**SUMMARY OF SECOND AMENDED CHAPTER 11 PLAN OF
REORGANIZATION DATED JUNE 30, 2022**

Class 1 – Administrative Claims: All Class 1 Administrative Claims will be paid as the parties agree.

Class 2 – Freedom Mortgage Company (formerly Pacific Mortgage): Freedom Mortgage holds the first mortgage on 3307 Waterford Drive Pittsburgh PA 15238. This is a residential property that the Debtor and his spouse uses as their home. The debtor shall continue making payments on this obligation without modification. ***To the extent there are any arrears, the arrearages will be cured within 12 months of confirmation. The Debtor will pay 1/12th of the allowed arrears to the creditor on or before the 20th of each month.***

Class 3 – Citizen Bank Home Equity: Citizens Bank holds the second mortgage on 3307 Waterford Drive Pittsburgh PA 15238. The Debtor will restructure the mortgage over a new ten-year term and 3.5% interest rate.

Class 4 – Priority Tax Claims: This Class shall be limited to the principal and interest only claim of the Internal Revenue Service Claim #1. All Priority Tax Claims that are allowed will be paid off over five (5) years at the requisite statutory interest rate for the respective creditor. The penalty and fee portions of these claims will be treated in Class 8.

Class 5 – General Unsecured Creditors: Class 5 is composed of all creditors who have an allowed unsecured claim against the Debtor as of the Petition Date. Factoring the non-collectability of any judgment, this Plan proposes the use of exempt social security and pension income to make payments to creditors. The Allowed Unsecured Claims in this Class will be paid divided into two subgroups:

Subgroup A contains all General Unsecured Creditors who do not affirmatively elect to be treated in **Subgroup B**. By default all General Unsecured Creditors, unless elected otherwise, are in **Subgroup A**. Subgroup A creditors will be treated as follows:

- i. This class will be paid up to \$ 15,000.00¹ over five years without interest.

¹ The Dividend to this class is not possible to project until the ballots accepting class 5 treatment have been submitted. It is possible that all creditors will elect to be members of Subgroup B and no creditors will populate subgroup A. Depending on the outcome of the ballots, any unused portion of class 5 dividend, subgroup A will be added the amounts paid to subgroup B.

This class will not be discharged from any amount which was not paid under the plan.

ii. At the conclusion of the plan payments, the creditors in this class may enforce any collection rights they have as to the unpaid amounts they are due.

Subgroup B shall contain all General Unsecured Creditors who affirmatively elect to accept a discharge of the unpaid portions of their claims under the Plan. Creditors in Subgroup B will be treated as follows:

Claims who affirmatively accept a discharge of the unpaid portions of their claims under this Plan will participate in Class 5(B).

i. If they accept this plan treatment, the Debtor will pay this Class 5(B) a minimum of \$ 85,000.00² over 10 years without interest or \$708.33 a month for 120 months.

ii. These Class 5(B) class members must designate, on their ballot, their acceptance to participate in class 5(B) and accept a discharge at the completion of Plan Payments of any unpaid portion of their claim.

iii. The Debtor is securing the payment to class 5 (B) by a mortgage in the amount of \$ 85,000.00.

iv. At the completion of payments, Creditors in Class 5(B) will accept a contractual discharge of any unpaid portion of their claims under this Plan.

Class 6: Class 6 is comprised of Robleto Kuruce PLLC. The Debtor will pay Robleto Kuruce, PLLC the sum of \$ 10,000.00 over time. The first payment shall be made within 30 days after the confirmation of the Plan and each month thereafter until the 60 payments have been made.

i. This sum will be paid in 60 equal installments of \$166.66.

ii. Upon Completion of the payments of the \$10,000.00, Robleto Kuruce, PLLC will waive and agree to discharge any remaining claim they have against the Debtor or Grace Betancourt-Jones.

Respectfully Submitted,

DATE: June 30, 2022

BY: /s/ Donald R. Calaiaro
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² It is possible that all creditors will elect to be members of Subgroup B and no creditors will populate subgroup A. Depending on the outcome of the ballots, any unused portion of class 5 dividend, subgroup A will be added the amounts paid to subgroup B.

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FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) **Bankruptcy No. 17-22147-GLT**
Ronald S. Jones,) **Chapter 11**
) **Related Document No. 224**
Debtor.) **Document No.**

**CERTIFICATE OF SERVICE OF Summary of Second Amended Chapter 11 Plan of
Reorganization Dated June 30, 2022**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on June 30, 2022

Service by E-mail:

Ronald S. Jones ronaldsjones3307@gmail.com and gbgracebetancourtr@gmail.com

Service by NEF:

Jodi Hause, on Behalf of the United States Trustee by on behalf of U.S. Trustee Office of the United States Trustee; jodi.hause@usdoj.gov, David.A.Berry@usdoj.GOV; Steven.W.Albright@usdoj.GOV
Robert Shearer on behalf of Trustee Robert Shearer; information@robertshearer.com,
rshearer@ecf.axosfs.com; rspclaw@gmail.com
Samuel R. Grego on behalf of Spec. Counsel Samuel R. Grego; gregos@dmclaw.com,
rmccartney@dmclaw.com

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

Executed on: June 30, 2022

/s/ Donald R. Calaiaro
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